

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

**IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,**

Plaintiff,

v.

**THE ESTATE (SUCCESSION) OF DORIS
IGOIN, LAURENCE APFELBAUM,
individually and in her capacities as executor
and beneficiary of the Estate (Succession) of
Doris Igoin, and EMILIE APFELBAUM,**

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04336 (SMB)

**PROPOSED ORDER AUTHORIZING DEFENDANTS TO FILE JURISDICTIONAL
MEMORANDUM OF LAW IN FURTHER SUPPORT OF DEFENDANTS' MOTION TO
DISMISS AND DECLARATION OF JONATHAN K. COOPerman UNDER SEAL**

Upon the motion of Defendants The Estate (Succession) of Doris Igoin, Laurence Apfelbaum, individually and in her capacities as executor and beneficiary of the Estate (Succession) of Doris Igoin, and Emilie Apfelbaum (“Defendants”) to file their Jurisdictional Memorandum of Law in Further Support of Defendants’ Motion to Dismiss, dated June 20, 2014, and Exhibit 2 to the Declaration of Jonathan K. Cooperman in Further Support of Defendants’ Motion to Dismiss, dated June 20, 2014 under seal (the “Sealed Documents”);

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein and Defendants are authorized to file the Sealed Documents under seal.
2. The Sealed Documents shall remain under seal and confidential and shall not be made available to anyone without the prior written consent of the Defendants or further order from this Court.
3. This order is subject to the objection and further order of this Court in the event of any such objection.
4. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

Dated: New York, New York
June __, 2014

Stuart M. Bernstein
United States Bankruptcy Judge